

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CIVIL ACTION FILE
v.)	
)	NO. 1:16-CV-03088-ELR
STATE OF GEORGIA,)	
)	
Defendant.)	

**CONSENT MOTION TO EXTEND TIME TO ANSWER
PLAINTIFF'S COMPLAINT, SERVE INITIAL DISCLOSURES,
AND FILE AN AMENDED PROPOSED SCHEDULING ORDER
AND JOINT PRELIMINARY REPORT AND DISCOVERY PLAN**

Defendant and Plaintiff (collectively the “Parties”) hereby jointly and respectfully move this Court for an order extending Defendant’s time to file an answer, and for the Parties to serve their initial disclosures and file an amended proposed scheduling order and joint preliminary report and discovery plan (the Parties originally filed a joint preliminary report and discovery plan on December 1, 2016). The Defendant’s answer is currently due May 27, 2020. Pursuant to the Court’s May 13, 2020 Order denying Defendant’s Motion to Dismiss, the Parties’ initial disclosures and amended scheduling order and joint preliminary report and discovery plan are due June 3, 2020.

The Parties request that the Court extend the above listed due-dates by 15 days. The Parties seek this extension due to the impacts of the COVID-19 pandemic and resulting school closures on this litigation and the Parties themselves. Specifically, students are not in school and Defendant's operations are impacted by issues that arise daily related to the pandemic and resulting closures. The Parties seek this extension in an attempt to avoid multiple delays that may come up related to these issues.

The present Motion is not made to delay this matter and will not prejudice any party to this action. A trial date has not yet been set.

For all of the foregoing reasons, the Parties move this Court for an extension to June 11, 2020, for the Defendant to file an answer, and to June 18, 2020 for the Parties to serve their initial disclosures and file an amended proposed scheduling order and joint preliminary report and discovery plan. A proposed order is attached as Exhibit 1.

This 21st day of May, 2020.

On Behalf of Plaintiff:

/s/ Aileen Bell Hughes (w/ permission)
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On Behalf of Defendant:

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CERTIFICATE OF COMPLIANCE

I certify that the documents to which this certificate is attached have been prepared with one of the font and point selections approved by the Court in Local Rule 5.1C for documents prepared by computer.

/s/ Josh Belinfante
Josh Belinfante

CERTIFICATE OF SERVICE

I certify that the foregoing **CONSENT MOTION TO EXTEND TIME
TO ANSWER PLAINTIFFS' COMPLAINT, SERVE INITIAL
DISCLOSURES, AND FILE AN AMENDED PROPOSED SCHEDULING
ORDER AND JOINT PRELIMINARY REPORT AND DISCOVERY PLAN**

was served this day by filing it with the Court's CM/ECF System, which automatically notifies parties and counsel of record.

This 21st day of May, 2020.

/s/ Josh Belinfante
Josh Belinfante